

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

PLAINTIFF CV1 MOTHER,  
as Next Friend of and on behalf of PLAINTIFF  
CV1, a Minor Child,

Plaintiffs,

vs.

ROCKY SHAY FRANKLIN, an individual;  
MINDGEEK S.A.R.L., a foreign entity; MG  
FREESITES, LTD, d/b/a “PORNHUB”, a  
foreign entity; MG FREESITES II, LTD, a  
foreign entity; MINDGEEK USA,  
INCORPORATED, a Delaware corporation,  
MINDGEEK CONTENT RT LIMITED, a  
foreign entity; 9219-1568 QUEBEC, INC. d/b/a  
MINDGEEK, a foreign entity; MG BILLING  
LTD, a foreign entity; MG CY  
HOLDINGS LTD, a foreign entity,

Defendants.

Civil Action No. 2:22-cv-605-ECM

**JOINT STATUS REPORT**

Pursuant to the Court’s March 12, 2024 Order, *see* ECF No. 53, Plaintiff CV1 Mother and Plaintiff CV1 (“Plaintiffs”) and Defendants MindGeek S.à.r.l., MG Freesites Ltd, MG Freesites II Ltd, MindGeek USA Incorporated, MG CY Holdings Ltd, MindGeek Content RT Limited, 9219-1568 Quebec Inc., and MG Billing Ltd (“Defendants,” and collectively with Plaintiffs, the “Parties”), by and through the undersigned counsel, jointly submit this status report informing the Court of the status of their settlement negotiations. The Parties are in almost daily discussions concerning settlement negotiations and have made significant progress. Moreover, Plaintiffs’ counsel has communicated he soon intends to file a motion for leave to substitute and amend the pleadings to substitute plaintiff CV1 as the sole and proper plaintiff while the Parties’ negotiations continue.

DATED: July 1, 2024

RESPECTFULLY SUBMITTED,

/s/ J. Parker Miller

J. Parker Miller  
Houston W. Kessler  
BEASLEY, ALLEN, CROW, METHVIN,  
PORTIS & MILES, P.C.  
Overlook II  
2839 Paces Ferry Road; Suite 400  
Atlanta, GA 30339  
800-898-2034  
parker.miller@beasleyallen.com  
houston.kessler@beasleyallen.com

Clay M. Phillips  
CLAY PHILLIPS LAW FIRM LLC  
341 Mendel Parkway East  
Montgomery, AL 36117  
334-277-8753  
clay@clayphillipslaw.com

**Attorneys for Plaintiffs**

/s/ Sara M. Turner

Sara M. Turner  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, PC  
1901 Sixth Street North  
Suite 2600  
Birmingham, Alabama 35203  
Tel: (205) 328-0480  
Fax: (205) 322-8007  
smtturner@bakerdonelson.com

**Attorney for Defendants MindGeek  
S.à.r.l., MG Freesites Ltd, MG Freesites II  
Ltd, MindGeek USA Incorporated, MG  
CY Holdings Ltd, MindGeek Content RT  
Limited, 9219-1568 Quebec Inc., and MG  
Billing Ltd**

**CERTIFICATE OF SERVICE**

I certify that on this day, July 1, 2024, a copy of the foregoing was served on all counsel of record via CM/ECF and/or electronic mail.

Rocky Shay Franklin  
FCI  
3625 FCI Road  
Marianna, FL 32446

/s/ Sara M. Turner  
Sara M. Turner